

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

**UNITED STATES OF AMERICA, *ex rel.*
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,
V. RAO NADELLA, M.D., and
MARTIN JACOBS, M.D.,**

Relators,

V.

**BRADFORD REGIONAL MEDICAL CENTER,
V & S MEDICAL ASSOCIATES, LLC,
PETER VACCARO, M.D.,
KAMRAN SALEH, M.D.,
and DOES I through XX,**

Defendants.

Civil Action No. 04-186E

**DEFENDANT BRADFORD REGIONAL MEDICAL CENTER'S
RULE 26(a)(1) DISCLOSURES**

NOW COMES Defendant Bradford Regional Medical Center ("BRMC"), through its undersigned attorneys, which makes the following disclosures required by F.R.C.P. 26(a)(1). In making said disclosures, BRMC expressly reserves any evidentiary privileges or objections that may be asserted with respect to the information described below.

- (A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

1. George Leonhardt
President/CEO
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding the equipment lease between BRMC and V&S Medical Associates, LLC ("V&S") and negotiations related thereto, BRMC's Policy on Physicians with Competing Interests and other matters related to the claims of Relators and/or defenses of BRMC.

2. James Tarasovitch
Senior Vice President/CFO
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding BRMC's Medicare, Medicaid and CHAMPUS cost reports and other financial matters relating to the claims of Relators and/or defenses of BRMC.

3. Robert E. Fisher
President and CEO
Brookville Hospital
100 Hospital Road
Brookville, PA 15825

Information regarding the equipment lease between BRMC and V&S.

4. Charles T. Day
Senior Vice President Finance & Treasurer
Sioux Valley Hospitals and Health System
1305 W. 18th Street
Sioux Falls, SD 57105
605-333-6569

Information regarding the fair market value of amounts paid by BRMC to V&S pursuant to the equipment lease.

5. Susan Stowell
Consultant
Stroudwater Associates
443 Congress Street
Portland, ME 04101
207-756-6090

Information regarding the fair market value of amounts paid by BRMC to V&S pursuant to the equipment lease.

6. Marc E. Voyvodich
Chairman and CEO
Stroudwater Associates
443 Congress Street
Portland, ME 04101
207-756-6090

Information regarding the fair market value of amounts paid by BRMC to V&S pursuant to the equipment lease.

7. Kamran Saleh, M.D.
V & S Medical Associates, LLC
24 W. Washington Street
Bradford, PA 16701
814-368-1000

Information regarding the equipment lease between BRMC and V&S and negotiations related thereto, discussions with BRMC relating to BRMC's Policy on Physicians with Competing Interests.

8. Peter Vaccaro, M.D.
V & S Medical Associates, LLC
24 W. Washington Street
Bradford, PA 16701
814-368-1000

Information regarding the equipment lease between BRMC and V&S and negotiations related thereto, discussions with BRMC relating to BRMC's Policy on Physicians with Competing Interests.

9. Michael Shanks
Budget Manager
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding BRMC's budget process and finances.

10. Tina Hannahs
Director of Revenue Management
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding claims for payment submitted by BRMC to Medicare, Medicaid and CHAMPUS.

11. Bradley Brotherton, CPA
BK & D
Springfield, MO
417-865-8701

Information regarding BRMC's Medicare cost reports.

12. Glen A. Washington
Sr. Vice President, Operations
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding operations of BRMC.

13. Cathy Rouff
Executive Secretary
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding Board minutes of BRMC.

14. William Schroeder
Philips Medical Capital
6 Ashcroft Street
Auburn, MA 01501
508-832-5238

Information regarding lease of nuclear imaging equipment by BRMC and V&S.

15. Weston Feldin
Philips Medical Capital
1111 Old Eagle School Road
Wayne, PA 19087
866-514-4762

Information regarding lease of nuclear imaging equipment by BRMC and V&S.

16. Tim Weppner
Philips Medical Capital
1111 Old Eagle School Road
Wayne, PA 19087
866-514-4762

Information regarding lease of nuclear imaging equipment by BRMC and V&S.

17. Tim Brown
Director of Diagnostic Imaging
Bradford Regional Medical Center
116 Interstate Parkway
Bradford, PA 16701-0218
814-362-8233

Information regarding lease of nuclear imaging equipment by BRMC and V&S.

18. Barbara Robinson
Philips Medical Capital
1111 Old Eagle School Road
Wayne, PA 19087
866-514-4762

Information regarding lease of nuclear imaging equipment by BRMC and V&S.

19. Jason Gerdes
Philips Medical Capital
1111 Old Eagle School Road
Wayne, PA 19087
866-514-4762

Information regarding lease of nuclear imaging equipment by BRMC and V&S.

20. Dilbagh Singh, M.D.
6 North Center Street
Bradford, PA 16701
814-368-7000

Information regarding claims made in Relators' Complaint.

21. Paul Kirsch, M.D.
1223 E. Main Street
Bradford, PA 16701
814-368-5402

Information regarding claims made in Relators' Complaint.

22. V. Rao Nadella, M.D.
6 North Center Street
Bradford, PA 16701
814-368-7000

Information regarding claims made in Relators' Complaint.

23. Martin Jacobs, M.D.
125 Main Street
Suite 205
Bradford, PA 16701
814-368-7154

Information regarding claims made in Relators' Complaint.

24. Debbie Allison
President, BRMC Auxiliary
144 Congress Street
Bradford, PA 16701
814-362-3334

Information about actions and discussions of BRMC Board while a member of Board.

25. Doug Bell
President/CEO
Control Chief Corporation, Inc.
200 Williams Street
Bradford, PA 16701
814-362-6811

Information about actions and discussions of BRMC Board while a member of Board.

26. Francis Cahill
Owner
Hollenbeck-Cahill Funeral Home
P.O. Box 46
Bradford, PA 16701
814-362-6643

Information about actions and discussions of BRMC Board while a member of Board.

27. Mike Cahill
Funeral Director
Hollenbeck-Cahill Funeral Home
P.O. Box 46
Bradford, PA 16701
814-362-6643

Information about actions and discussions of BRMC Board while a member of Board.

28. Carlyle Conn
Sales & Marketing
MM Answering Service
21 E. Corydon Street
Bradford, PA 16701
814-362-4658

Information about actions and discussions of BRMC Board while a member of Board.

29. Rev. J. Arthur Cox
465 Interstate Parkway
Bradford, PA 16701
814-362-9924

Information about actions and discussions of BRMC Board while a member of Board.

30. Martin Digel
President
Hamlin Bank & Trust
333 W. Main Street
P.O. Box 367
Smethport, PA 16749
814-887-5555

Information about actions and discussions of BRMC Board while a member of Board.

31. Fred Gallup
McDowell Wick Daly
Gallup & Hauser
78 Main Street
Bradford, PA 16701
814-362-5517

Information about actions and discussions of BRMC Board while a member of Board.

32. David Godfrey, M.D.
VP Medical Affairs
Bradford Regional Medical Center
125 Main Street
Bradford, PA 16701
814-368-7125

Information about actions and discussions of BRMC Board while Vice President of Medical Affairs.

33. Luis Gonzalez, M.D.
Medical Staff President
Bradford Regional Medical Center
181 Interstate Parkway
Bradford, PA 16701
814-362-4345

Information about actions and discussions of BRMC Board while a member of Board.

34. Harrijane Hannon
Register of Wills
McKean County Courthouse
P.O. Box 202
Smethport, PA 16749
814-887-3263

Information about actions and discussions of BRMC Board while a member of Board.

35. Christopher Hauser
McDowell Wick Daly
Gallup & Hauser
78 Main Street
Bradford, PA 16701
814-362-5517

Information about actions and discussions of BRMC Board while a member of Board.

36. Daniel McCune
Plant Manager
Allegheny Bradford Corp.
P.O. Box 200
Bradford, PA 16701
814-362-2590

Information about actions and discussions of BRMC Board while a member of Board.

37. Richard McDowell, Ph.D.
Board Chairman
President Emeritus
University of Pittsburgh at Bradford
300 Campus Drive
Bradford, PA 16701
814-362-5020

Information about actions and discussions of BRMC Board while a member of Board.

38. Sandra McKinley
Chairman, Bradford Hospital Foundation
23 Orchard Valley
Bradford, PA 16701
814-368-7135

Information about actions and discussions of BRMC Board while a member of Board.

39. Madeline Miles
Community Member
184 Derrick Road
Bradford, PA 16701
814-368-7217

Information about actions and discussions of BRMC Board while a member of Board.

40. Narayan Nayak, M.D.
Pediatrician
195 Pleasant Street
Bradford, PA 16701
814-368-5615

Information about actions and discussions of BRMC Board while a member of Board.

41. Edwin Pecht
5 Vista Circle
Bradford, PA 16701
814-362-7781

Information about actions and discussions of BRMC Board while a member of Board.

42. Thomas Urban
Beacon Light Behavioral Health System
800 East Main Street
Bradford, PA 16701
814-362-6565

Information about actions and discussions of BRMC Board while a member of Board.

43. Mark Welch, M.D.
Medical Staff Vice President
BRMC Diagnostic Imaging
116 Interstate Parkway
Bradford, PA 16701
814-362-8600

Information about actions and discussions of BRMC Board while a member of Board.

44. Michael Schuler
Special Board Advisor
Westny Building Products Co.
2580 Walden Avenue
Buffalo, NY 14225-4791
716-681-2000

Information about actions and discussions of BRMC Board while a member of Board.

45. Craig Hartburg
Servco Services, Inc.
52 Davis Street
Bradford, PA 16701
814-368-7022

Information about actions and discussions of BRMC Board while a member of Board.

46. Anita Herbert, M.D.
BRMC Occ. Health Dept.
116 Interstate Parkway
Bradford, PA 16701
814-362-2010

Information about actions and discussions of BRMC Board while a member of Board and relating to BRMC's Policy on Physicians with Competing Interests while President of the Medical Staff.

47. Alan J. Steinberg, Esquire
Horty, Springer & Mattern, P.C.
4614 Fifth Avenue
Pittsburgh, PA 15213
412-687-7677

Information concerning nonprivileged communications between counsel for BRMC and V&S, and Drs. Saleh and Vaccaro, regarding the application of BRMC's Policy on Physicians with Competing Interests to Drs. Saleh and Vaccaro and the lease of imaging equipment by BRMC from V&S.

48. Edward J. Kabala, Esquire
Fox, Rothschild, LLP
Dominion Tower
625 Liberty Avenue, 29th Floor
Pittsburgh, PA 15222
412-391-1334

Information concerning nonprivileged communications between counsel for BRMC and V&S, and Drs. Saleh and Vaccaro, regarding the application of BRMC's Policy on Physicians with Competing Interests to Drs. Saleh and Vaccaro and the lease of imaging equipment by BRMC from V&S.

49. Marc S. Raspanti, Esquire
Miller, Alfano & Raspanti, P.C.
Suite 3402
1818 Market Street
Philadelphia, PA 19103

Information concerning nonprivileged communications between counsel for BRMC and V&S, and Drs. Saleh and Vaccaro, regarding the application of BRMC's Policy on Physicians with Competing Interests to Drs. Saleh and Vaccaro.

50. Jodeen M. Hobbs, Esquire
Miller, Alfano & Raspanti, P.C.
Suite 3402
1818 Market Street
Philadelphia, PA 19103

Information concerning nonprivileged communications between counsel for BRMC and V&S, and Drs. Saleh and Vaccaro, regarding the application of BRMC's Policy on Physicians with Competing Interests to Drs. Saleh and Vaccaro.

51. Kevin Raphael, Esquire
Miller, Alfano & Raspanti, P.C.
Suite 3402
1818 Market Street
Philadelphia, PA 19103

Information concerning nonprivileged communications between counsel for BRMC and V&S, and Drs. Saleh and Vaccaro, regarding the application of BRMC's Policy on Physicians with Competing Interests to Drs. Saleh and Vaccaro.

52. Any expert or other witnesses who will be subsequently disclosed by Defendants.
 53. Other present or former officers, employees or directors of BRMC.
 54. Any persons identified in the Relators' Rule 26 disclosures.
 55. All witnesses identified in the Rule 26 disclosures of V & S Medical Associates, Dr. Vaccaro, and/or Dr. Saleh.
 56. Any witnesses identified in the documents produced by the parties.
 57. Any experts or other witnesses who will be subsequently disclosed by the parties.
- (B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

The following documents, described by category, are in the possession of the Bradford Regional Medical Center Administration Offices located at 116 Interstate Parkway, Bradford, PA 16701-0218.

1. Documents relating to lease of nuclear imaging equipment by BRMC from V&S.
2. Documents relating to BRMC's Policy on Physicians with Competing Interests and its application to Drs. Saleh and Vaccaro.
3. Medicare, Medicaid and CHAMPUS Cost Reports filed by BRMC.
4. Claims for payment from Medicare, Medicaid and CHAMPUS submitted by BRMC.
5. Documents related to discussions between BRMC and members of its medical staff regarding the possibility of forming a joint venture to provide imaging services under arrangement to BRMC.
6. Documents relating to Dr. Singh.
7. Documents relating to Dr. Kirsch.
8. Documents relating to Dr. Nadella.

9. Documents relating to Dr. Jacobs.
 10. Correspondence, including letters, faxes and e-mails.
 11. Agreements, leases, and drafts thereof, and related documents.
 12. Financial and accounting records.
- (C) **A computation of any category of damages claimed by the disclosing party and the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Not applicable.

- (D) **Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

None.

Defendants reserve the right to supplement or correct the above disclosures to the extent not prohibited by the Federal Rules of Civil Procedure.

Respectfully submitted this 21st day of November 2006.



Daniel M. Mulholland III
Henry M. Casale
HORTY, SPRINGER & MATTERN, P.C.
4614 Fifth Avenue
Pittsburgh, PA 15213
(Phone) 412-687-7677
(Facsimile) 412-687-7692
(E-Mail) dmulholland@hortyspringer.com
(E-Mail) hcasale@hortyspringer.com

**ATTORNEYS FOR DEFENDANT
BRADFORD REGIONAL MEDICAL CENTER**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached document was served on each of the following attorneys via First Class United States Mail on the date set forth below:

Carl J. Rychcik, Esquire
Fox Rothschild LLP
625 Liberty Avenue
29th Floor
Pittsburgh, PA 15222-3115


Andrew M. Stone, Esquire
Stone & Stone
828 Frick Building
437 Grant Street
Pittsburgh, PA 15219

G. Mark Simpson, Esquire
Simpson Law Firm, LLC
165 North Main Street
Jonesboro, GA 30236

Robert L. Eberhardt, Esquire
United States Attorney's Office
Civil Division
USPO & Courthouse
Pittsburgh, PA 15219

Michael Granston, Esquire
U.S. Department of Justice
Commercial Litigation Branch
P.O. Box 261
Ben Franklin Station
Washington, DC 20044

November 26, 2006


Daniel M. Mulholland III